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**Susan M. Jennik (SJ 4607)**  
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**Attorneys for IUE-CWA**

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>DPH Holdings Corp., et al.,</b>	:
	:
<b>Debtor.</b>	:
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**Chapter 11 Case No.**  
**05-44481 (RDD)**

**DESIGNATION OF RECORD AND STATEMENT OF ISSUES**

Pursuant to Rule 8006 of the Bankruptcy Rules, IUE-CWA, a creditor, in the above-entitled action and applicant herein, designates the following contents for inclusion in the record on appeal:

**DESIGNATION OF THE RECORD ON APPEAL**

<u>Item</u>	<u>Bankr. Doc. No.</u>	<u>Description</u>
1	20197	Transcript regarding hearing held on May 20, 2010 at 10:12 a.m.
2	20190	Order Pursuant to 11 U.S.C. § 503(b)(3) and (b)(4) Denying Substantial Contribution Claim of IUE-CWA
3	20165	IUE-CWA Response to Reorganized Debtors' Objection to Substantial Contribution Application
4	19860	Objection of the United States Trustee to Creditors' Applications for Reimbursement of Professional Fees and Expenses
5	19256	Seventh and Final Application of Skadden, Arps, Slate,

- Meagher & Flom LLP, Counsel to Debtors and Debtors-in-Possession, Seeking Final Allowance and Payment of Compensation and Reimbursement of Expenses Under 11 U.S.C. §§330 and 331 ("Seventh and Final Skadden Fee Application")
- 6 19212 Final Fee and Expense Application of Latham & Watkins LLP, as Counsel to the Office of Unsecured Creditors
- 7 19119 Notice of Filing of Exhibits to Application of the Delphi Trade Committee for Reimbursement of Expenses Arising from Substantial Contribution Made in These Cases
- 8 19116 Application of the Delphi Trade Committee for Reimbursement of Expenses Arising from Substantial Contribution Made in These Cases
- 9 19115 Summary Sheet and Application of Certain Senior Noteholders pursuant to 503(b)(3) and (4) of the Bankruptcy Code for Allowance and Reimbursement of Reasonable Compensation and Actual Necessary Expenses in Making a Substantial Contribution to the Debtors' Chapter 11 Case
- 10 19114 Declaration of *Thomas M. Kennedy in support of Motion of IUE-CWA* (related document(s) 19113) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #1 Affidavit of Service) (Kennedy, Thomas) (Entered: 11/20/2009)
- 11 19113 Motion of IUE-CWA Pursuant to Sections 503(b)(3)(D) and (b)(4) of the Bankruptcy Code for Allowance and Payment of Fees Incurred in Making a Substantial Contribution to the Debtors' Chapter 11 Case
- 12 19091 Application by Davidson Kempner Capital Management LLC; Elliott Associates, L.P.; Nomura Corporate Research & Asset Management, Inc.; Northeast Investors Trust; SPCP Group, LLC; and Whitebox Advisors, LLC, on Behalf of Themselves and Senior Noteholders Previously Represented, for Payment of Fees and Expenses Pursuant to 11 U.S.C. §1129(a)(4) and Bankruptcy Rule 9019
- 13 18958 Notice of (A) Order Approving Modifications to First

Amended Joint Plan of Reorganization of Delphi  
Corporation and Certain Affiliates, Debtors and Debtors-in-  
Possession and (B) Occurrence of Effective Date

- |    |       |   |
|----|-------|---|
| 14 | 18707 | Order Signed on July 30, 2009 Approving Modifications Under 11 U.S.C. Section 1127(b) to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession, as Modified and (II) Confirming Order (Docket No. 12359) . (Li, Dorothy) (Entered: 07/30/2009)   |
| 15 | 14211 | Objection to Motion <i>for Order Authorizing Debtors to Implement Amended and Restated Global Settlement Agreement and Master Restructuring Agreement with General Motors Corporation</i> (related document(s) 14164) filed by Eric D. Goldberg on behalf of Highland Capital Management, L.P., CR Intrinsic Investors, LLC. (Goldberg, Eric) (Entered: 09/22/2008) |
| 16 | 14082 | Objection to Motion <i>Objection to Debtors' Motion to Authorize Amendment to Arrangement with General Motors Corp. and Request for the Appointment of an Examiner</i> (related document(s) 14031) filed by Eric D. Goldberg on behalf of Highland Capital Management, L.P., CR Intrinsic Investors, LLC (Goldberg, Eric) (Entered: 08/20/2008)                     |
| 17 | 13485 | Order Under 11 U.S.C. §§363 and 1146 Fed. R. Bankr. P. 2002, 6004, and 9014 Authorizing and Approving (I) Sale by Delphi Automotive Systems LLC of Certain Machinery, Equipment, and Inventory Used at Debtor's Kettering Facility Free and Clear of Liens and (II) Entry Into Lease Agreement in Connection Therewith ("Kettering Sale Approval Order")            |
| 18 | 12478 | Transcript of Hearing Held on January 22, 2008 at 10:14 AM.   |
| 19 | 12476 | Transcript of Hearing Held on January 17, 2008 at 10:26 AM.   |
| 20 | 12359 | Findings of Fact, Conclusions of Law, and Order Confirming First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-possession, as modified signed on 1/25/2008  |

(related document(s) 11386) (Li, Dorothy) (Entered:  
1/25/2008)

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| 21 | 12216 | Supplemental Limited Objection of IUE-CWA and Affiliated Locals to Debtors' Proposed Management Compensation Plan and Salaried Employee Compensation Program (Filed Under Seal)   |
| 22 | 12207 | Limited Objection to Debtors' Proposed Management Compensation Plan and Salaried Employee Compensation Program (Filed Under Seal)   |
| 23 | 12156 | Limited Objection of IUE-CWA and Affiliated Locals to Debtors' Proposed Management Compensation Plan and Salaried Employee Compensation Program (Filed Under Seal)  |
| 24 | 12026 | Limited Objection of IUE-CWA and Affiliated Locals to Debtors' Proposed Management Compensation Plan and Salaried Employee Compensation Program   |
| 25 | 11600 | Transcript of Hearing Held on December 6, 2007 at 10:28 AM, <i>Re: Motion to the Equity Security Holders to Adjourn Disclosure Statement Hearing And Equity Purchase And Commitment Agreement, etc.</i>   |
| 26 | 11582 | Preliminary Limited Objection of IUE-CWA to Debtors' Proposed Management Compensation Plan and Salaried Employee Compensation Program   |
| 27 | 11579 | Order Under 11 U.S.C. §§363, 365, and 1146 and Fed. R. Bankr. P. 2002, 6004, 6006, and 9014 Authorizing and Approving (I) Sale of Certain Debtors' Assets Comprising Substantially All the Assets of the Cockpits and Interior Systems and Integrated Closure Systems Businesses Free and Clear of Liens, Claims, and Encumbrances, (II) Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Assumption of Certain Liabilities ("Interiors and Closures Business Sale Approval Order") |
| 28 | 11389 | Order Approving (I) Disclosure Statement, (II) Record Date, Voting Deadline, and Procedures for Temporary Allowance of Certain Claims, (III) Hearing Date to Consider Confirmation of Plan, (IV) Procedures for Filing Objections to Plan, (V) Solicitation Procedures for Voting   |

on Plan, (VI) Cure Claim Procedures, (VII) Procedures for Resolving Disputes Relating to Postpetition Interest, and (VIII) Reclamation Claim Procedures (“Solicitation Procedures Order”)

- 29                    11049                    *Objection of the Delphi Trade Committee to the First Amended Disclosure Statement with Respect to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors in Possession* (related document(s) 10964) filed by David S. Rosner on behalf of Delphi Trade Committee, with hearing to be held on 11/29/2007 at 10:00 AM at Courtroom 610 (RDD) (Attachments: #1 Exhibit A) (Rosner, David) (Entered: 11/21/2007)
- 30                    11042                    *Objection of the Delphi Trade Committee to the Debtors’ Expedited Motion for Order Under 11 USC 105(a), 363(b), 503(b), and 507(a) Authorizing and Approving Amendment to Delphi-Appaloosa Equity Purchase and Commitment Agreement* (related document(s) 10760) filed by David S. Rosner on behalf of Delphi Trade Committee. (Rosner, David). (Entered: 11/21/2007)
- 31                    11013                    *Objection of the IUE-CWA to the Expedited Motion for Order Under 11 U.S.C. §§105(a), 363(b), 503(b) and 507(a) Authorizing and Approving Amendment to Delphi-Appaloosa Equity Purchase and Commitment Agreement*
- 32                    9467                    *Objection to Motion (Objection by IUE-CWA to Third Supplemental KECP Motion)* filed by Thomas M. Kennedy on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers – Communications Workers of America (IUE-CWA) (Kennedy, Thomas) (Entered: 09/20/2007)
- 33                    9106                    Order approving memorandum of understanding among IUE-CWA, Delphi, and General Motors Corporation including modification of IUE-CWA Collective Bargaining Agreements and Retiree Welfare Benefits for Certain IUE-CWA-Represented Retirees (Exhibit 1: IUE-CWA, Delphi, General Motors - Memorandum of Understanding) (Related Doc #8907) signed on 8/16/2007. (Li, Dorothy) (Entered 08/16/2007)
- 34                    7335                    *Objection to Motion (Objection by IUE-CWA to Second*

*Supplemental KECP Motion (Docket #7200))* filed by Thomas M. Kennedy on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers – Communications Workers of America (IUE-CWA), International Union of Electric, Electrical, Salaried, Machine and Furniture Workers, Communications Workers of America (IUE-CWA). (Kennedy, Thomas) (Entered: 03/19/2007)

- 35            7118            Transcript of Hearing Held on January 12, 2007 at 10:05 AM, re: Notice of Hearing Notice of Sufficiency Hearing With Respect to Debtors' Objection to Proofs of Claim, etc.
- 36            6832            Transcript of Hearing Held on January 11, 2007 at 10:14 AM.
- 37            6589            Order signed on 1/12/07 Authorizing and Approving The Equity Purchase and Commitment Agreement and The Plan Frame Work Support Agreement (Related Doc #6179). (Philbert, Gemma) Additional attachment(s) added on 1/12/2007 (Philbert, Gemma). (Entered: 1/12/2007)
- 38            6531            Response *Debtors' Omnibus Reply To Objections To Plan Investment and Framework Support Approval Motion* (related document(s) 6401, 6254, 6501, 6330, 6500, 6367, 6211, 6497, 6344, 6496, 6242, 6209, 6247) filed by John Wm. Butler Jr. on behalf of Delphi Corporation, with hearing to be held on 1/11/2007 at 10:00 AM at Courtroom 610 (RDD) (Attachments: #1 Exhibit A #2 Exhibit B #3 Exhibit C #4 Exhibit D #5 Exhibit E #6 Exhibit F) (Butler, John) (Entered: 01/10/2007)
- 39            6500            Supplemental Objection of IUE-CWA to Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b), and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b) and 1125(e) of the Bankruptcy Code
- 40            6497            Objection to Motion/*Second Supplemental Objection of the Official Committee of Equity Security Holders in Opposition to Debtors' Expedited Motion for Order Authorizing and Approving the Equity Purchase Agreement Pursuant to Sections 105(a), 363(b) and 1125(e) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b) and*

*1125(e) of the Bankruptcy Code [Redacted]* (related document(s) 6179) filed by Bonnie Steingart on behalf of Official Committee of Equity Security Holders of Delphi Corporation, et al. with hearing to be held on 1/11/2007 at 10:00 AM at Courtroom 610 (RDD) (Attachments: #1 Bonnie Steingart Declaration) (Steingart, Bonnie) (Entered: 01/09/2007)

- 41            6496            Supplemental Objection of IUE-CWA to Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b), and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b) and 1125(e) of the Bankruptcy Code (related document(s) 6179) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers - Communications Workers of America. (Kennedy, Thomas) (Entered: 01/09/2007)
- 42            6401            *Objection of the United States Trustee to Expedited Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b) and 507(a) of the Bankruptcy Code and the Plan Framework Agreement Pursuant to Sections 105(a), 363(b), and 1125(e) of the Bankruptcy Code*, filed by Alicia M. Leonhard on behalf of United States Trustee. (Leonhard, Alicia) (Entered: 01/03/2007)
- 43            6367            *Objection to Motion FOR ORDER AUTHORIZING AND APPROVING THE EQUITY PURCHASE AND COMMITMENT AGREEMENT PURSUANT TO SECTION 105(a), 363(b), 503(b) and 507(a) OF THE BANKRUPTCY CODE AND THE PLAN FRAMEWORK SUPPORT AGREEMENT PURSUANT TO SECTIONS 105(a), 363(b) and 1125(e) OF THE BANKRUPTCY CODE* filed by Marianne Goldstein Robbins on behalf of IBEW Brotherhood of Electrical Workers Local 663. (Robbins, Marianne) (Entered: 01/02/2007)
- 44            6344            *Objection to Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement and the Plan Framework Support Agreement* filed by Barbara S Mehlsack on behalf of International Union of Operating Engineers (IOUE) Local Union Nos. 18, 101 and 832. (Mehlsack, Barbara) (Entered: 12/29/2006)

- 45                    6330                    *Objection to Motion Objection and Response to Expedited Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b) and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b), and 1125(e) of the Bankruptcy Code* (related document(s) 6179) filed by Judith Elkin on behalf of Highland Capital Management L.P. with hearing to be held on 1/11/2007 at 10:00 AM at Courtroom 610 (RDD) Objections due by 1/2/2007, (Attachments: # 1 Exhibit A – Commitment Letter) (Elkin, Judith) (Entered: 12/28/2006)
- 46                    6254                    *Objection to Motion/Preliminary Objection of the Delphi Trade Committee for the Expedited Motion for Order Authorizing and Approving Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b), and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b) and 1125(e) of the Bankruptcy Code* (related document(s) 6179) filed by David Sol Rosner on behalf of Delphi Trade Committee. (Rosner, David) (Entered: 12/21/2006)
- 47                    6247                    *Objection/First Supplemental Objection of the Official Committee of Equity Security Holders in Opposition to Debtors' Expedited Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b) and 1125(e) of the Bankruptcy Code* (related document(s) 6179, 6211) filed by Bonnie Steingart on behalf of Official Committee of Equity Security Holders of Delphi Corporation, et al. with hearing to be held on 1/5/2007 at 10:00 AM at Courtroom 610 (RDD) (Steingart, Bonnie) (Entered: 12/20/2006)
- 48                    6242                    Preliminary Objection of IUE-CWA to Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b) and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b) and 1125 (e) of the Bankruptcy Code
- 49                    6211                    *Objection to Motion/Preliminary Objection of the Official Committee of Equity Security Holders to Expedited Motion for Order Authorizing and Approving the Equity Purchase*



*and Commitment Agreement Pursuant to Sections 105(a), 363(b), and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b), and 1125(e) of the Bankruptcy Code* (related document(s) 6179) filed by Bonnie Steingart on behalf of Official Committee of Equity Security Holders of Delphi Corporation, et al. (Steingart, Bonnie) (Entered: 12/19/2006)

50                    6209                    *Objection (Preliminary) of the Official Committee of Unsecured Creditors to the Expedited Motion for Order Authorizing and Approving The Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b) and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant to Sections 105(a), 363(b), and 1125(e) of the Bankruptcy Code* (related document(s) 6179) filed by Robert J. Rosenberg on behalf of The Official Committee of Unsecured Creditors. (Rosenberg, Robert) (Entered: 12/19/2006)

51                    6179                    *Motion to Authorize - Expedited Motion for Order Authorizing and Approving The Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b) and 507(a) of the Bankruptcy Code and the Plan Framework Support Agreement Pursuant To Sections 105(a), 363(b), and 1125(e) of the Bankruptcy Code* filed by John Wm. Butler Jr. on behalf of Delphi Corporation. with hearing to be held on 1/5/2007 at 10:00 AM at Courtroom 610 (RDD) Responses due by 1/2/2007, (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Notice# 4 Proposed Order) (Butler, John) (Entered: 12/18/2006)

52                    4892                    FILED UNDER SEAL Declaration of James D. Clark in Support of Objection of IUE-CWA to Delphi's Section 1113/1114 Motion, filed by Thomas M. Kennedy on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers, Communications Workers of America

53                    4630                    *Objection by IUE-CWA to Supplemental KECP Motion* filed by Thomas M. Kennedy on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers, Communications Workers of America (IUE-CWA), with hearing to be held on 7/19/2006 at 10:00 AM at Courtroom 610 (RDD) (Lopez, Mary) (Entered: 07/20/2006)

- 54 4524 Objection to Motion (*Objection by IUE-CWA to Supplemental KECP Motion (related document 4419)*) (related document(s) 213) filed by Thomas M. Kennedy on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers, Communications Workers of America (IUE-CWA). (Kennedy, Thomas) (Entered: 07/12/2006)
- 55 4461 Order Under 11 U.S.C. §363(b) and Fed.R.Bankr.P. 6004 Approving (I) Supplement to UAW Special Attrition Program, and (II) IUE-CWA Special Attrition Program
- 56 4364 Response to Motion (*Response of IUE-CWA in Support of Debtors' Motion for Approval of IUE-CWA Special Attrition Program*) (related document(s) 4269) filed by Larry Magarik on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers – Communications Workers of America (IUE-CWA). (Magarik, Larry) (Entered: 06/27/2006)
- 57 3927 Motion for Order Under 11 U.S.C. §363(b) and Fed.R.Bankr.P. 2002 and 6004 Authorizing and Approving Debtors' Entry Into Transfer Agreement With Johnson Controls, Inc. Providing For (A) Sale of Acquired Assets Free and Clear of Liens, Claims, and Encumbrances (B) Continuation and Transition of Supply to Johnson Controls, Inc. of Batter Products Out of Fitzgerald Facility and (C) Implementation of Attrition Plan with Respect to New Brunswick Facility in Accordance with IUE-CWA Memorandum (New Brunswick Transfer Motion)
- 58 3817 Declaration *FILED UNDER SEAL: Supplemental Declaration by Henry Reichard in Support of Objection of IUE-CWA to Delphi's Section 1113/1114 Motion* (related document(s) 228 ) filed by Thomas M. Kennedy on behalf of International Union of Electric, Electrical, Salaried, Machine and Furniture Workers Communications Workers of America (IUE-CWA). (Lopez, Mary) (Entered: 05/19/2006)
- 59 3427 Objection of IUE-CWA to Motion for Order Under 11 U.S.C. Sections 1113(c) Authorizing Rejection of Collective Bargaining Agreements and Under 11 U.S.C. Sections 1114(g) Authorizing Modification of Retiree Welfare Benefits filed by Thomas M. Kennedy on behalf of

International Union of Electric, Electrical, Salaried,  
Machine and Furniture Workers Communications Workers  
of America (IUE-CWA). (Lopez, Mary) (Entered:  
04/26/2006)

- 60            3344            Declaration of *Rochone Ruffin* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibits A-C) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent). Modified on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 61            3343            Declaration of *Frank Allen* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibits A-F) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 62            3341            Declaration of *Ted Williams* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #1 Exhibit A-G) (Kennedy, Thomas) (Entered: 04/21/2006)
- 63            3340            Declaration of *Henry Newman* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibit A-B) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 64            3339            Declaration of *Brian Gilson* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibit A-B) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 65            3338            Declaration of *Michael Palmer* (related document(s) 3332)

- filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #1 Exhibit A-B) (Kennedy, Thomas) (Entered: 04/21/2006)
- 66                    3336                    Declaration of *Donald O. Arbogast* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibits A-E) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 67                    3335                    Declaration of *Keith Bailey* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibits A-I) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 68                    3334                    Declaration of *Henry Reichard* (related document(s) 3332) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Attachments: #2 Exhibits A-G) (Kennedy, Thomas) Additional attachment(s) added on 4/27/2006 (Bush, Brent) (Entered: 04/21/2006)
- 69                    3333                    Stipulation for Substitution of Counsel for *Clarion Corporation of America* filed by John T. Gregg on behalf of Clarion Corporation of America. (Attachments: #1 Proposed Order) (Gregg, John) (Entered: 04/21/2006)
- 70                    3332                    Opposition Brief *Objection and Memorandum of Law in Support of Objection of IUE-CWA to Motion for Order under section 1113 and 1114* (related document(s) 3035) filed by Thomas M. Kennedy on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications Workers of America. (Kennedy, Thomas) (Entered: 04/21/2006)
- 71                    2717                    Declaration of *Russell A. Belinsky* filed by Hanan B. Kolko on behalf of International Union of Electronic, Salaried, Machine and Furniture Workers – Communications

Workers of America. (Kolko, Hanan) (Entered:  
03/07/2006)

72                    2224                    Order Granting Motion to Authorize Debtors to Pay  
Certain Financial Advisor Fees and Expense Incurred by  
the United Automobile, Aerospace and Agricultural  
Implemental Workers of America and the International  
Union of Electronic, Electrical, Salaried, Machine and  
Furniture Workers – Communications Workers of America  
(Related Doc #1930) signed on 2/9/2006. (Li, Dorothy)  
(Entered: 02/09/2006)

73                    1333                    *Objection and Memorandum of Law in Support of  
Objection of IUE-CWA to Motion for Order Authorizing  
the Debtors to Implement a Key Employee Compensation  
Program ("KECP Motion")* (related document(s) 213) filed  
by Larry Magarik on behalf of International Union of  
Electronic, Salaried, Machine and Furniture Workers -  
Communications Workers of America. (Attachments: # 1  
Affidavit in Support of Objection# 2 Affidavit of Service)  
(Richards, Beverly) (Entered: 11/29/2005)

74                    1168                    *Affidavit in Support of Objection of IUE-CWA to Motion  
for Order Under Sections 105 & 363 Authorizing the  
Debtors to Implement a Key Employee Compensation  
Program* (related document(s) 1164) filed by Larry  
Magarik on behalf of International Union of Electronic,  
Salaried, Machine and Furniture Workers –  
Communications Workers of America. (Magarik, Larry)  
(Entered: 11/23/2005)

75                    1164                    *Objection to Motion for Order under Sections 105 & 363  
Authorizing the Debtors to Implement a Key Employee  
Compensation Program and Memorandum of Law in  
Support of Objection* (related document(s) 13) filed by  
Larry Magarik on behalf of International Union of  
Electronic, Salaried, Machine and Furniture Workers –  
Communications Workers of America. (Magarik, Larry)  
(Entered: 11/23/2005)

Hearing Exhibits, 5/6/10,  
not docketed

Ex. 6 Wire Confirmation for Invoices (Nov,2005-Feb, 2006)

Ex. 7 Wire Confirmation from Delphi A/P (Aug.2006-Mar. 2008)

Ex. 8 Summary of Payments to Chanin Capital Partners,

Ex. 9 Invoices Received from Chanin Capital Partners, LLP

**STATEMENT OF ISSUES ON APPEAL**

Appellant further states that it intends to present the following issues on appeal:

1. Whether the Bankruptcy Court erred in failing to find that IUE-CWA made a substantial contribution to Debtors' reorganization where the IUE-CWA played a leading role in permitting the estate to reorganize including successful challenges to management compensation plans which would have cost the estate \$80 million dollars had they been included in the plan of reorganization?

Answer: Yes.

2. Whether the Bankruptcy Court erred in finding that only an indirect benefit was conferred on the Debtors' estate by the IUE CWA including the IUE-CWA's actions that resulted in an agreement modifying Debtors' collective bargaining agreements?

Answer: Yes.

Dated: New York, New York  
June 22, 2010

Respectfully submitted,

KENNEDY, JENNIK & MURRAY, P.C.  
Attorneys for IUE-CWA

By: /s/ Thomas M. Kennedy  
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